

Comments for the Revised Final New-Indy Remedial Plan

The following comments are targeted to the Revised Final Remedial Plan QAPP and are organized according to the structure of the QAPP.

Table 1 QAPP Distribution List

Danny France, Chief, Science and Ecosystem Support Division

Should be replaced with Liza Montalvo, Laboratory Services and Applied Sciences Division

Table 2 Project Roles and Responsibilities

More detailed information is needed for the roles and responsibilities of project staff/management.

This section should address such things as:

1. The person responsible for preparing, reviewing, and approving reports/documents;
2. The person responsible for performing audits/assessment of site activities; and
3. The person responsible for performing corrective actions and ensuring they are completed in a timely manner.

Figure 1 Project Organization Chart

The chart needs to also include the data reviewers for the project.

1.5 Problem Definition/Background

The second paragraph discusses both the onsite fence-line monitoring required by the EPA CAA § 303 Order, issued on May 13, 2021, and the off-site ambient air monitoring required by the SC DHEC Order, issued on May 7, 2021, and the EPA Section 114 information request, issued on May 13, 2021. The QAPP that EPA is conditionally approving as part of this Revised Final Remedial Plan is only for the onsite fence-line monitoring, pursuant to the EPA 303 Order. The language in the second paragraph implies that this QAPP is being used to satisfy the requirements of the SC DHEC Order.

“On May 7, 2020, SC DHEC issued an Order to Correct Undesirable Level of Air Contaminants (DHEC Order) reportedly in response to residential odor complaints from Lancaster and York Counties in South Carolina and adjoining North Carolina counties. Paragraph 4 on Page 7 of 9 requires New-Indy to submit this QAPP to conduct onsite H2S Monitoring.”

References to SC DHEC Order or EPA’s 114 information request shall be removed so that it is clear this QAPP is only for the onsite monitoring required by EPA’s May 13, 2021 CAA § 303 Order.

1.6 Project Description

For subparagraph (f), QA/G-5 should be replaced with QA/G-4.

2.5.3 H₂S One-Point Quality Control Checks

Please ensure that all referenced QC check frequencies are consistent throughout the document. In this section, the QC of each continuous gaseous pollutant analyzer is performed at a minimum frequency of once every two weeks. However, under the general 2.5 heading under Hydrogen Sulfide, the 1-point QC check is daily.

2.6 Data Validation Criteria

An explanation and/or justification for invalidating data would need to be included in any reports that are submitted to EPA and SC DHEC.

2.10 Non-direct Measurements

PM₁₀ should be replaced with H₂S in the first paragraph. Additional, for the last paragraph, the EPA guidance documents that are referenced should be specifically identified.

2.11.2 Data Transmittal

This section should specify that the original raw data will be preserved in a data file separate from any edited data.

3.1.5 QAPP Revisions

It should be stated that any revisions to the QAPP would be reviewed and approved by SC DHEC and EPA Region 4.

3.2.1 Weekly Reports

The person responsible for preparing the weekly reports should be identified.

3.2.1 Monthly Data Reports

The person responsible for preparing the monthly data reports should be identified.

3.2.2 Monthly Data Reports

Missing or invalid data values will be replaced in the data reports with appropriate null data codes. Please provide a reference or define the null data code.

3.2.5 Response/Corrective Action Report

The person responsible for performing the corrective actions should be identified.

4.1 Data Review, Verification, and Validation

The ambient air quality data should be compared to the validation tables that are contained within the QAPP (i.e., Table 11) not the QA Handbook, although the tables should comply with the handbook requirements.

4.1.1 Sampling Design

The regulation was renamed in 2016 to 40 CFR Appendix A to Part 58 - Quality Assurance Requirements for Monitors used in Evaluations of National Ambient Air Quality Standards.

4.1.4 Calibration

A correction is needed since Section 2.7 addresses testing, inspection, and maintenance. Section 2.8 of the QAPP addresses calibration.